

**United States Bankruptcy Court
for the Southern District of Texas**

Houston Division

In re **Sokona Diallo**

Debtor(s)

Case No. **22-33351-H1-7**

Chapter **13**

RESPONSE TO TRUSTEE'S MOTION TO COMPEL AND FOR SANCTIONS, (Dkt #43)

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Sokona Diallo, Debtor and party in interest in the above-captioned case. Debtor pleads the following in Response to Trustee's Motion to Compel and for Sanctions.

1. With respect to paragraph 1, Debtor admits the allegation set forth.
2. With respect to paragraph 2, Debtor admits the allegation set forth.
3. With respect to paragraph 3, Debtor admits the allegation set forth.
4. With respect to paragraph 4, Debtor admits the allegation set forth.
5. With respect to paragraph 5, Debtor admits the allegation set forth.
6. With respect to paragraph 6, Debtor admits the allegation set forth.
7. With respect to paragraph 7, Debtor admits the allegation set forth.
8. With respect to paragraph 8, Debtor admits the allegation set forth.
9. With respect to paragraph 9, Debtor admits the allegation set forth.
10. With respect to paragraph 10, Debtor admits the allegation set forth.
11. With respect to paragraph 11, Debtor admits the allegation set forth.
12. With respect to paragraph 12, Debtor admits the allegation set forth.
13. With respect to paragraph 13, Debtor admits the allegation set forth.
14. With respect to paragraph 14, Debtor admits the allegation set forth.
15. With respect to paragraph 15, Debtor admits the allegation set forth as of the date of the filing of this motion.
16. With respect to paragraph 16, the allegation cannot be denied.
17. With respect to paragraph 17, Debtor admits the allegation set forth.

18. With respect to paragraph 18, Debtor admits the allegation set forth.

19. With respect to paragraph 19, Debtor admits that she operated ventures which included night clubs and lounges in and around the Houston area and that the Trustee's requests involve investigating and better understanding the Debtor's business and financial affairs.

20. With respect to paragraph 20, Debtor admits that she has failed to timely produce all of the requested documents and information necessary for the Trustee to investigate the financial affairs of the Debtor.

Debtor has produced over ninety percent of the requested documents, however, there are documents which have not been produced. Debtor's counsel is assisting Debtor in obtaining these outstanding documents.

Debtors counsel and the Trustee's counsel have communicated regarding the documents which have not been produced.

WHEREFORE, Debtor requests after notice and hearing,

a. Denying the relief sought in Movant's motion, provided the Debtor complies and produces the outstanding requested documents and records.

Respectfully submitted:

Date **May 12, 2023**

Signature **/s/ Emil R. Sargent**

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Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Trustee's Motion to Compel and for Sanctions was served via ECF and/or United States mail, postage prepaid and/or Email on May 12, 2023 on the following parties:

Janet S. Northrup, Trustee
Via ECF

United States Trustee
Southern District of Texas
USTPRegion07.HU.ECF@USDOL.GOV

Sokona Diallo
Via Email

Simon R. Mayer
Simon.Mayer@lockelord.com

/s/Emil R. Sargent
EMIL R. SARGENT